



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

MAR 17 1992

Ref: 8HWM-FF

Ms. Susan Nachtrieb
Water Quality Coordinator
City of Westminster
4800 West 92nd Avenue
Westminster, CO 80030

Dear Ms. Nachtrieb:

Thank you for providing EPA with the opportunity to review the draft Field Sampling, Analysis, and Quality Assurance Project Plan for the Standley Lake Diversion Project. We are providing comments with the understanding that the environmental assessment for the Standley Lake Diversion Project is currently being finalized in response to public comments and that project alternatives are still being considered. We believe our comments apply in general to construction activities within potentially contaminated areas.

We understand that the cities' objective in undertaking this work is to collect data to support a risk assessment for the construction activities associated with the Standley Lake diversion canal. With this objective in mind, we have identified areas which will require revision to ensure that all potential exposure pathways are considered. Our enclosed specific comments elaborate on the necessary revisions.

There is no indication in the document that the Department of Energy (DOE) has reviewed and approved the proposed field program. EPA believes that such approval is part of DOE's responsibility as lead agency for the Comprehensive Environmental Response, Compensation, and Liability Act activities at the Rocky Flats Plant site. In addition, coordination of this field activity with remedial investigation work for Operable Units 3 and 5 may help to facilitate this project.

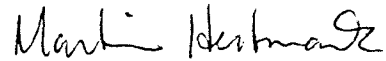
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We would be happy to meet with you to discuss the enclosed comments and to agree on revisions to the program to address our concerns. Please contact Bonnie Lavelle at (303)294-1067 to arrange such a meeting.

Sincerely,



Martin Hestmark, Manager
Rocky Flats Project

Enclosures

cc: Frazer Lockhart, DOE
Robert Birk, DOE
Michael Guillaume, EG&G
Joe Schieffelin, CDH
John Wegrzyn, USFWS